

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

EDNA DELGADO,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

No.

2015L00773-1  
CALENDAR/EDNA  
TIME 08:30  
Premises Liability

JUL 29 PM 3:32

COMPLAINT

The plaintiff, EDNA DELGADO, through her attorneys, STOTIS & BAIRD CHARTERED, complains of the defendant, TARGET CORPORATION, as follows:

1. That for some time prior to September 7, 2013, the defendant, Target Corporation (hereinafter referred to as "Target") operated, managed and maintained a certain retail store known as Target, located at 6525 West Diversey Avenue, in the City of Chicago, Cook County, Illinois.

2. That on or about September 7, 2013, the plaintiff, Edna Delgado, was lawfully on the premises at the aforesaid location.

3. That at all times material hereto, it was the duty of the defendant to maintain the property in a condition that was reasonably safe for persons lawfully on or about said property.

4. That, notwithstanding said duty, the defendant committed one or more of the following negligent acts:

- a. allowed a liquid to remain on the floor when with a reasonable degree of care, they should have known that said liquid was present and posed a risk to persons;
- b. failed to warn the persons on the premises of the liquid accumulated on the floor when defendant knew or should have known of its presence;
- c. failed to use reasonable care in monitoring the store and in removing the accumulated liquid from the floor;
- d. caused a liquid to be on the floor, creating a hazard.



5. That as a direct and proximate result of one or more of the foregoing acts, the plaintiff slipped in the accumulated liquid, causing her personal injury, pain and suffering, disfigurement and disability, and to incur medical bills, to lose wages, all to her damage, and continues to incur these damages.

WHEREFORE, the plaintiff, Edna Delgado, demands judgment against the defendant, Target Corporation, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, together with the costs of this suit.

Respectfully submitted,

**STOTIS & BAIRD CHARTERED**

By: 

Eric J. Parker

#13589

**STOTIS & BAIRD CHARTERED**

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